

BARRACK, RODOS & BACINE

SAMUEL M. WARD (216562)

One America Plaza

600 West Broadway, Suite 900

San Diego, CA 92101

Telephone: (619) 230-0800

Facsimile: (619) 230-1874

sward@barrack.com

*Counsel for the Board of Education Employees'
Pension Fund of Essex County*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☒ Affects Both Debtors
☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**JOINDER OF BOARD OF EDUCATION
EMPLOYEES' PENSION FUND OF ESSEX
COUNTY TO SECURITIES LEAD
PLAINTIFF'S OBJECTION TO
REORGANIZED DEBTORS' MOTION TO
APPROVE SECURITIES ADR AND
RELATED PROCEDURES FOR
RESOLVING SUBORDINATED
SECURITIES CLAIMS [D.I. 9189]**

1 The Board of Education Employees' Pension Fund of Essex County, the holder of a
2 Securities Claim¹ and a creditor in the chapter 11 bankruptcy cases (the "**Chapter 11 Cases**") of
3 the above-captioned reorganized debtors (the "**Debtors**", or as reorganized pursuant to the Plan,
4 the "**Reorganized Debtors**"), by and through its undersigned counsel, submits this joinder
5 ("**Joinder**") to *Securities Lead Plaintiff's Objection to Reorganized Debtors' Motion to Approve*
6 *Securities ADR and Related Procedures for Resolving Subordinated Securities Claims* [Docket
7 No. 9189] (the "**Securities ADR Objection**"), in opposition to *Reorganized Debtors' Motion to*
8 *Approve Securities ADR and Related Procedures for Resolving Subordinated Securities Claims*
9 [Docket No. 8964] (the "**Securities ADR Motion**"). In support of this Joinder, the Board of
10 Education Employees' Pension Fund of Essex County, respectfully states as follows:

11 **JOINDER AND RESERVATION OF RIGHTS**

12
13 1. The Board of Education Employees' Pension Fund of Essex County is a Securities
14 Claimant and timely filed proofs of claim against the Debtors by the Extended Bar Date (Claim
15 Nos. DPKST27423 and HZJK!27423).

16 2. The Board of Education Employees' Pension Fund of Essex County incorporates by
17 reference and hereby joins in all arguments set forth in the Securities ADR Objection.

18 3. The Board of Education Employees' Pension Fund of Essex County reserves its right
19 to supplement this Joinder and further reserves its rights to participate in any hearing to consider
20 the Securities ADR Motion, including its rights to make any arguments and to examine
21 witnesses.

22
23
24
25
26 ¹ Capitalized terms not defined herein shall have the meaning ascribed to them in the Securities
27 ADR Objection (as defined herein) and the Securities ADR Motion (as defined herein), as
28 applicable.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CONCLUSION

For all of the foregoing reasons, the Board of Education Employees' Pension Fund of Essex County respectfully requests that this Court enter an Order denying the Securities ADR Motion and granting such other and further relief as may be just and proper.

Dated: October 6, 2020

BARRACK, RODOS & BACINE

By: /s/ Samuel M. Ward
Samuel M. Ward (216562)
One America Plaza
600 West Broadway, Suite 900
San Diego, CA 92101
Telephone: (619) 230-0800
Facsimile: (619) 230-1874
sward@barrack.com

*Counsel for the Board of Education Employees'
Pension Fund of Essex County*